

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Norfolk Division**

DENIA DUFFY,

Plaintiff,

v.

PAE GOVERNMENT SERVICES, INC.,

Defendant.

Civil Action No.
2:13-cv-00066-RGD-TEM

Room: 193
Judge: Hon. Robert G. Doumar

**MEMORANDUM IN SUPPORT OF DEFENDANT'S MOTION FOR EXTENSION OF
TIME FOR REPLY TO PLAINTIFF'S OPPOSITION TO MOTION FOR
INTRA-DISTRICT TRANSFER TO THE ALEXANDRIA DIVISION**

Defendant PAE Government Services, Inc. (hereinafter "Defendant" or "PAE"), through its undersigned counsel, and pursuant to Local Rule 7(I), respectfully requests that this Court grant an extension of one (1) day for PAE to file its Reply to Plaintiff's Memorandum in Opposition to Defendant's Motion for Intra-District Transfer to the Alexandria Division ("Reply").¹

On April 2, 2013, Plaintiff filed its Memorandum in Opposition to Defendant's Motion for Intra-District Transfer. Pursuant to Local Rule 7(F)(1), PAE's rebuttal brief to Plaintiff's Opposition was due last Friday, April 5, 2013, within three days of service.

PAE's Motion for Intra-District transfer and related matters were being coordinated by one of the associate attorneys for PAE's law firm, Baker & McKenzie. On March 26, 2013, this Court admitted the associate attorney to appear and practice in the Eastern District of Virginia *pro hac vice*. Last week, the same week that PAE's Reply to Plaintiff's Opposition was due, the associate attorney unexpectedly departed from Baker & McKenzie. Due to a miscommunication regarding the transfer of responsibility for the case from the associate attorney to another Baker & McKenzie attorney, PAE's Reply was not filed timely on Friday, April 5, 2013.

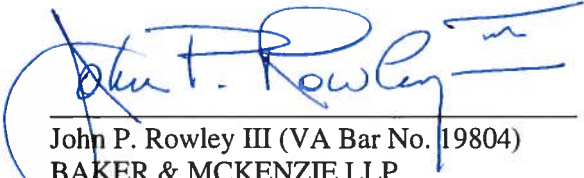
¹ At the time PAE filed its Motion for Extension of Time and this supporting Memorandum, it also separately filed its proposed Reply to Plaintiff's Opposition.

Counsel for PAE has worked diligently to provide both the Central District of California, where this case originally was filed, and the Eastern District of Virginia, with timely briefing. This Motion for Extension of Time is being filed on Monday, April 8, 2013, the first business day following the day PAE's Reply was due. A one-day extension would enable counsel to continue its practice of submitting timely briefings to the Court without prejudice to Plaintiff.

WHEREFORE, PAE respectfully requests that this Court grant this Motion and accept as timely PAE's Reply to Plaintiff's Memorandum in Opposition to Defendant's Motion for Intra-District Transfer to the Alexandria Division, contemporaneously filed herewith.

Date: April 8, 2013

By:



John P. Rowley III (VA Bar No. 19804)
BAKER & MCKENZIE LLP
815 Connecticut Ave, NW
Washington, DC 20006-4078
Telephone: +1 202 835 6161
Facsimile: +1 202 416 7151
Email: john.rowley@bakermckenzie.com
Attorney for Defendant
PAE GOVERNMENT SERVICES, INC.